SITE: Kast Metals
BREAK:
OTHER: 2-26-85

## FEB 2 6 1985

## MEMORANDUM

SUBJECT: Keokuk Steel Casting (Kast Metals Corp.) Keokuk, Iowa

FROM:

Robert L. Morby

Chief, Waste Management Branch

TO:

Michael J. Sanderson

Chief, Air and Waste Compliance Branch

The above-referenced site was the subject of a referral from your branch to ours several months ago. Subject facility apparently operated as a hazardous waste disposal facility without either interim status or a Permit. The referral requested that potential threats to health or the environment posed by this disposal be addressed under our Superfund program.

As a result of your referral a preliminary assessment of this site was conducted. We have also evaluated the site as a potential candidate for the National Priorities List (NPL). Two developments since your referral limit our ability to proceed any further with this site under the Superfund program:

-We now have a much larger number of sites being considered as candidates for the NPL and need to be able to prioritize our work on this and other potential NPL candidate sites.

-Your RCRA compliance program has received additional authority, specifically 3008(h), which might now be used to address releases beyond the facility boundary.

The EPA Headquarters Superfund program is now requiring that NPL candidate sites be screened for any which might be regulatable under the authorities of RCRA. Therefore, before I will allow my staff to proceed any further with this site as a Superfund site, I will require assurance from your program that the authorities of RCRA, including 3008(h), can not be used to address the actual or potential releases from this site. Please advise in order that we may prioritize our requests for field activities on potential NPL candidate sites for the upcoming quarter.

bcc: Don Sandifer, AWCS
Jane Werholtz, CNSL
Paul Doherty, ENSV/SINV

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

FEB 12 1985

OFFICE OF
THE REGIONAL ADMINISTRATOR

Mr. Stephen W. Ballou
Executive Director
Iowa Department of Water, Air and Waste Management
Henry A. Wallace Building
900 East Grand
Des Moines, Iowa 50319

Dear Mr. Ballou:

In accordance with Section 3008(a)(2) of the Resource Conservation and Recovery Act (RCRA), I am hereby giving notice to you that the Environmental Protection Agency (EPA) plans to issue a Section 3008 Compliance Order against Kast Metals Corporation (formerly referred to as Keokuk Steel Castings), Keokuk, Iowa.

The facility was referred to EPA, for enforcement of the RCRA permit and operation requirements, along with supporting documentation in your letter of June 20, 1984.

I appreciate the efforts and the interest displayed by you and your staff in this case. If you have any questions concerning this matter please contact Michael J. Sanderson at 816/374-5082.

Sincerely yours,

Morris Kay

Regional Administrator

cc: Mark Landa and Pete Hamlin

Iowa Department Water, Air and Waste Management